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Attorneys for Defendant
GOLDMAN SACHS BANK USA

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

TATYANA ROTKIN,)	Case No. 2:22-cv-01170-MCE-JDP
)	
Plaintiff,)	[Assigned to Hon. Morrison C. England,
)	Jr.]
v.)	
)	
GOLDMAN SACHS BANK USA,)	STIPULATION AND ORDER TO
)	ARBITRATE AND STAY ACTION
Defendant.)	

Action Filed: July 6, 2022

Plaintiff Tatyana Rotkin (“Plaintiff”) and defendant Goldman Sachs Bank USA (“GS Bank” and together, with Plaintiff, the “Parties”), by and through their undersigned counsel, hereby stipulate to stay this action against GS Bank, and to submit all claims against GS Bank to binding individual arbitration before JAMS, pursuant to the terms of the arbitration provision contained in the operative GS Bank Cardmember Agreement governing Plaintiff’s account with GS Bank. Plaintiff takes no position as to the validity of the arbitration provision contained in the operative GS Bank Cardmember Agreement, and is agreeing to submit the claims to arbitration in an effort to avoid incurring additional fees and costs.

NOW, THEREFORE, IT IS HEREBY STIPULATED by and between Plaintiff and GS Bank, through their respective counsel of record, that: (1) Plaintiff shall submit her claims against GS Bank in this action to arbitration before JAMS, pursuant to the arbitration agreement between Plaintiff and GS Bank; and (2) all proceedings in this matter are stayed pending completion of arbitration.

IT IS SO STIPULATED.

Dated: August 30, 2022

STROOCK & STROOCK & LAVAN LLP
ARJUN P. RAO
SHERI GUERAMI

By: /s/ Sheri Guerami
Sheri Guerami

Attorneys for Defendant
GOLDMAN SACHS BANK USA

1 Dated: August 30, 2022

PRICE LAW GROUP, APC
YOUSSEF H. HAMMOUD

3 By: /s/ Youssef H. Hammoud
4 Youssef H. Hammoud


5 Attorneys for Plaintiff
6 TATYANA ROTKIN

7
8 **ORDER**

9 Pursuant to the stipulation of the parties, (1) Plaintiff shall submit her claims
10 against GS Bank in this action to arbitration before JAMS, pursuant to the arbitration
11 agreement between Plaintiff and GS Bank; and (2) all proceedings in this matter are
12 stayed pending completion of arbitration. Not later than sixty (60) days following
13 the date this Order is electronically filed, and every sixty (60) days thereafter until
14 the stay is lifted, the parties shall file with the Court a Joint Status Report advising as
15 to the status of their arbitration.

16 IT IS SO ORDERED.

17 Dated: September 8, 2022

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19 MORRISON C. ENGLAND, JR.
20 SENIOR UNITED STATES DISTRICT JUDGE
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